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12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 UNITED STATES OF AMERICA,

15 Case No. 2:21-cr-00038-JCM-VCF

16 Plaintiff,

17 v.

18 SEAGRAM JOSHUA MILLER,

19 **STIPULATION TO CONTINUE**
20 **REVOCATION HEARING**
21 (First Request)

22 Defendant.

23 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
24 United States Attorney, and Kimberly M. Frayn, Assistant United States Attorney, counsel for
25 the United States of America, and Rene L. Valladares, Federal Public Defender, and Jacquelyn
26 N. Witt, Assistant Federal Public Defender, counsel for Seagram Joshua Miller, that the
Revocation Hearing currently scheduled on April 12, 2024, be vacated and continued to a date
and time convenient to the Court, but no sooner than thirty (30) days.

This Stipulation is entered into for the following reasons:

This is the first request for a continuance of the preliminary hearing.

1. Defense counsel needs additional time to advise Mr. Miller on this matter, and
additional time is required to conduct necessary investigation as to the allegations in the
Petition.

1 2. Defense counsel requests additional time to attain mitigating information and
2 prepare for the revocation hearing, if necessary.

3 3. Defense counsel received discovery on April 4, 2024, and additional time is
4 needed to review the discovery with Mr. Miller and advise him on the same.

5 3. Mr. Miller is in custody and agrees with the need to continue the hearing.

6 4. The parties agree to the continuance.

7 This is the first request for a continuance of the revocation hearing.

8 DATED this 3rd day of April, 2024.

9 RENE L. VALLADARES
10 Federal Public Defender

11 JASON M. FRIERSON
12 United States Attorney

13 By /s/ Jacquelyn N. Witt
14 JACQUELYN N. WITT
15 Assistant Federal Public Defender

16 By /s/ Kimberly M Frayn
17 KIMBERLY M. FRAYN
18 Assistant United States Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
v.
SEAGRAM JOSHUA MILLER,
Defendant.

Case No. 2:21-cr-00038-JCM-VCF

ORDER

IT IS THEREFORE ORDERED,

JAMES C. MAHAN
UNITED STATES DISTRICT JUDGE